



Compliance Deadlines & Extensions

NR 445 Technical Advisory Group
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Andrew Stewart, Bureau of Air Management
608-266-5499
e-mail: stewaa@dnr.state.wi.us



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Compliance Deadlines (Draft 4)

- ◆ Existing Sources
 - ◆ Final compliance 36 months after effective date of rule
 - ◆ Submission of BACT/LAER proposals 18 months after effective date of rule
- ◆ New/Modified Sources
 - ◆ Upon start-up



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Compliance Extensions (Current NR 445 & Draft 4)

- ◆ Existing Sources
 - ◆ Ability to get a 6 month extension from any deadline
- ◆ Existing Sources Subject to BACT/LAER Requirements
 - ◆ If DNR does not complete review within 6 months, source receives automatic 6 month extension



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Compliance Extensions - Concerns

- ◆ Department will not be able to approve BACT/LAER proposals within 6 months of submittal.
- ◆ Sources subject to BACT/LAER may not have enough time to implement control requirements after Department approval and still meet the 36 month compliance deadline.
- ◆ Current language is ambiguous



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February 2002 Proposal

- ◆ Compliance Deadlines & Extensions for Sources Subject to BACT/LAER Requirements
 - ◆ If Department does not complete review within 6 months source will be provided with an application “shield”.
 - ◆ After Department approval, source will get either the longer of the balance of the original 36 month compliance period or 24 months.